

The Honorable Marc Barreca  
Chapter 11  
Hearing: December 19, 2019; 9:30 AM  
Reply Date: December 12, 2019

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

In re:

No. 18-14536

TIMOTHY EYMAN,

Debtor(s),

REPORT OF DEBTOR'S COUNSEL ON  
OBJECTIONS TO DISCLOSURE  
STATEMENT UNDER LOCAL RULE 3017-1

COMES NOW the debtor, by and through his attorney, and files this Report under Local Bankruptcy Rule 3017-1 following the conference of counsel on objections filed to the Debtor's Proposed Disclosure Statement and the concurrent objection filed by the Debtor to the State of Washington's Disclosure Statement.

The parties conferenced as required under the Local Rules and agreed that each party would amend their proposed Disclosure Statements to either amend the Disclosure Statement and/or address the issues raised in the objections if an amendment is not appropriate. For instance, the State asserts that a date referenced in the Debtor's Disclosure Statement as to the entry of an order of the Thurston County Superior Court was incorrectly stated; the Debtor will correct the date. The State further states, again as an example, that the State's Administrative Claim was incorrect as it was fixed in time under the Court's order, and didn't address that the Claim is ongoing and continuing at

Notice of Hearing on Adequacy of  
Disclosure Statement-1

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1 \$500 per day until purged, and thus a clarifying statement should be included that the  
2 claim of \$186,409 is not a fixed amount but rather an ongoing amount.

3 The Debtor agreed to address the 7 points in the Objection.

4 Concurrently, the State agreed to address the Debtor's Objections similarly and  
5 will correct or include financial information (generally from the Debtor's Exhibits to his  
6 Disclosure Statement), and address the issues the Debtor raised as to feasibility, among  
7 other matters raised.

8 As such, the parties agreed in the Conference to file Amended Disclosure  
9 Statements, and move forward to confirmation of each of their proposed Plans.

10 Counsel for the Debtor pointed out that his offices are generally closed between  
11 Christmas and New Year's, and that Debtor's counsel, Kathryn Scordato, is getting  
12 married December 23<sup>rd</sup>. As such, the Debtor proposed that all Amended Disclosure  
13 Statements and Plans (if necessary) be filed by January 6, 2020, and note confirmation  
14 for the Court's calendar for February 6, 2020.

15 DATED this 17<sup>th</sup> day of December, 2019.

16 /s/ Larry B. Feinstein

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19 Larry B. Feinstein, WSBA #6074  
20 Attorney for Debtor